

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
Printpack, Inc.

AUTHORIZING THE OPERATION OF
Printpack Grand Prairie Converting Facility
Coated and Laminated Packaging Paper and Plastics Film Manufacturing

LOCATED AT
Tarrant County, Texas
Latitude 32° 42' 54" Longitude 97° 2' 36"
Regulated Entity Number: RN100211291

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: O1502 Issuance Date: _____

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
 - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)
 - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as

required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.
- B. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- C. Title 30 TAC § 115.142(1)(E) and (F) (relating to Control Requirements)
- D. Title 30 TAC § 115.146 (relating to Recordkeeping Requirements)
- 4. The permit holder shall comply with certified registrations submitted to the TCEQ for purposes of establishing federally enforceable emission limits. A copy of the certified registration shall be maintained with the permit. Records sufficient to demonstrate compliance with the established limits shall be maintained. The certified registration and records demonstrating compliance shall be provided, on request, to representatives of the appropriate TCEQ regional office and any local air pollution control agency having jurisdiction over the site. The permit holder shall submit updated certified registrations when changes at the site require establishment of new emission limits. If changes result in emissions that do not remain below major source thresholds, the permit holder shall submit a revision application to codify the appropriate requirements in the permit.

Additional Monitoring Requirements

- 5. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached "CAM Summary" upon issuance of the permit. In addition, the permit holder shall comply with the following:
 - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the "CAM Summary," deviations as defined by the deviation limit in the "CAM Summary." Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "CAM Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).

- D. The permit holder shall operate the monitoring, identified in the attached "CAM Summary," in accordance with the provisions of 40 CFR § 64.7.
- E. The permit holder shall comply with at least one of the following requirements for any capture system associated with the VOC control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective actions:
 - (i) Once a year the permit holder shall inspect the capture system in compliance of CAM for leaks in accordance with 40 CFR Part 60, Appendix A, Test Method 21. Leaks shall be indicated by an instrument reading greater than or equal to 500 ppm above background or as defined by the underlying applicable requirement; or
 - (ii) If a Method 21 test is performed and the source is determined not to be leaking (i.e. less than 500 ppm above background) or the system is documented to remain under negative pressure, the RO may certify that the source is in compliance with the applicable CAM requirement.
 - (iii) Once a month, the permit holder shall conduct a visual, audible, and/or olfactory inspection of the capture system in compliance of CAM to detect leaking components; or
- F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

- 6. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:
 - A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
- 7. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
- 8. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating

noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

9. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
10. Use of Emission Credits to comply with applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) Offsets for Title 30 TAC Chapter 116
 - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:
 - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
 - (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
 - (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)
11. Use of Discrete Emission Credits to comply with the applicable requirements:
 - A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables

- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
 - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
 - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
 - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
 - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

Protection of Stratospheric Ozone

12. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
- A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.
 - B. The permit holder shall comply with 40 CFR Part 82, Subpart H related to Halon Emissions Reduction requirements as specified in 40 CFR § 82.250 - § 82.270 and the applicable Part 82 Appendices.

Alternative Requirements

13. The permit holder shall comply with the approved alternative means of control (AMOC); alternative monitoring, recordkeeping, or reporting requirements; or requirements determined to be equivalent to an otherwise applicable requirement contained in the Alternative Requirements attachment of this permit. Units complying with an approved alternative requirement have reference to the approval in the Applicable Requirements summary listing for the unit. The permit holder shall maintain the original documentation, from the TCEQ Executive Director, demonstrating the method or limitation utilized. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.

Permit Location

14. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

15. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Alternative Requirement

Applicable Requirements Summary

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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
GRPTKFARM	STORAGE TANKS/VESSELS	TANK1, TANK2, TANK3	R5116-1	30 TAC Chapter 115, Storage of VOCs	True Vapor Pressure = True vapor pressure is less than 1.0 psia
GRPTKFARM	STORAGE TANKS/VESSELS	TANK1, TANK2, TANK3	R5116-2	30 TAC Chapter 115, Storage of VOCs	True Vapor Pressure = True vapor pressure is greater than or equal to 1.0 psia but less than 1.5 psia
GRPTKRTO	STORAGE TANKS/VESSELS	TANK4, TANK5	R5112-1	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
PRO-EL33	SURFACE COATING OPERATIONS	N/A	R5423-1	30 TAC Chapter 115, Surface Coating Operations	No changing attributes.
PRO-EL35	SURFACE COATING OPERATIONS	N/A	R5423-1	30 TAC Chapter 115, Surface Coating Operations	No changing attributes.
PRO-EL37/39	SURFACE COATING OPERATIONS	N/A	R5423-1	30 TAC Chapter 115, Surface Coating Operations	No changing attributes.
PRO-L01	SURFACE COATING OPERATIONS	N/A	R5423-1	30 TAC Chapter 115, Surface Coating Operations	No changing attributes.
PRO-PR08	PRINTING UNITS	N/A	R5432-1	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
PRO-PR09	PRINTING UNITS	N/A	R5432-1	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
PRO-PR10	PRINTING UNITS	N/A	R5432-1	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
PRO-PR11	PRINTING UNITS	N/A	R5432-1	30 TAC Chapter 115, Graphic Arts Processes	No changing attributes.
PRO-SAL30	SURFACE COATING OPERATIONS	N/A	R5423-1	30 TAC Chapter 115, Surface Coating Operations	No changing attributes.
PW01	SOLVENT DEGREASING MACHINES	N/A	R5412	30 TAC Chapter 115, Degreasing Processes	No changing attributes.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
PW02	SOLVENT DEGREASING MACHINES	N/A	R5412	30 TAC Chapter 115, Degreasing Processes	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRPTKFARM	EU	R5116-1	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
GRPTKFARM	EU	R5116-2	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
GRPTKRT0	EU	R5112-1	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
PRO-EL33	PRO	R5423-1	VOC	30 TAC Chapter 115, Surface Coating Operations	§ 115.423(3)(A) § 115.423(1) § 115.426	The capture and abatement system must be capable of achieving and maintaining emission reductions equivalent to the emission limitations of § 115.421 of this title and an overall control efficiency of at least 80% of the VOC emissions from those coatings. The owner or operator shall use the following equation to determine the minimum overall control efficiency necessary to demonstrate equivalency with the emission limitations of	[G]§ 115.425(2) § 115.425(4) [G]§ 115.425(4)(A)(ii) [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(i) § 115.426(2)(A)(ii) § 115.426(2)(A)(iii) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3) ** See CAM Summary	§ 115.426 [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3)	§ 115.423(3)(B) § 115.426(3)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						§115.421 of this title: (see Figure: 30 TAC §115.423(3)(A))			
PRO-EL35	PRO	R5423-1	VOC	30 TAC Chapter 115, Surface Coating Operations	§ 115.423(3)(A) § 115.423(1) § 115.426	The capture and abatement system must be capable of achieving and maintaining emission reductions equivalent to the emission limitations of § 115.421 of this title and an overall control efficiency of at least 80% of the VOC emissions from those coatings. The owner or operator shall use the following equation to determine the minimum overall control efficiency necessary to demonstrate equivalency with the emission limitations of §115.421 of this title: (see Figure: 30 TAC §115.423(3)(A))	[G]§ 115.425(2) § 115.425(4) § 115.425(4)(A)(i) [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(i) § 115.426(2)(A)(ii) § 115.426(2)(A)(iii) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3) ** See CAM Summary	§ 115.426 [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3)	§ 115.423(B) § 115.426(3)
PRO-EL37/39	PRO	R5423-1	VOC	30 TAC Chapter 115, Surface Coating Operations	§ 115.423(3)(A) § 115.423(1) § 115.426	The capture and abatement system must be capable of achieving and maintaining emission reductions equivalent to the emission limitations of § 115.421 of this title and an overall control efficiency of at least 80% of the VOC emissions from those coatings. The owner or operator shall use the following equation to determine the minimum overall control efficiency necessary to demonstrate	[G]§ 115.425(2) § 115.425(4) § 115.425(4)(A)(i) [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(i) § 115.426(2)(A)(ii) § 115.426(2)(A)(iii) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3) ** See CAM Summary	§ 115.426 [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3)	§ 115.423(3)(B) § 115.426(3)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						equivalency with the emission limitations of §115.421 of this title: (see Figure: 30 TAC §115.423(3)(A))			
PRO-L01	PRO	R5423-1	VOC	30 TAC Chapter 115, Surface Coating Operations	§ 115.423(3)(A) § 115.423(1) § 115.426	The capture and abatement system must be capable of achieving and maintaining emission reductions equivalent to the emission limitations of § 115.421 of this title and an overall control efficiency of at least 80% of the VOC emissions from those coatings. The owner or operator shall use the following equation to determine the minimum overall control efficiency necessary to demonstrate equivalency with the emission limitations of §115.421 of this title: (see Figure: 30 TAC §115.423(3)(A))	[G]§ 115.425(2) § 115.425(4) § 115.425(4)(A)(i) [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(i) § 115.426(2)(A)(ii) § 115.426(2)(A)(iii) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3) ** See CAM Summary	§ 115.426 [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3)	§ 115.423(3)(B) § 115.426(3)
PRO-PR08	PRO	R5432-1	VOC	30 TAC Chapter 115, Graphic Arts Processes	§ 115.432(c)(1)(C) § 115.432(c) § 115.432(c)(1) [G]§ 115.432(d)	The owner or operator shall operate a vapor control system that achieves an overall control efficiency of at least 80% by weight.	§ 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) § 115.435(c) § 115.436(c) § 115.436(c)(1) ** See CAM Summary	§ 115.436(c) § 115.436(c)(1) § 115.436(c)(2) § 115.436(c)(5) § 115.436(c)(6) § 115.436(c)(7)	§ 115.436(c)(6) § 115.436(c)(7)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
PRO-PR09	PRO	R5432-1	VOC	30 TAC Chapter 115, Graphic Arts Processes	§ 115.432(c)(1)(C) § 115.432(c) § 115.432(c)(1) [G]§ 115.432(d)	The owner or operator shall operate a vapor control system that achieves an overall control efficiency of at least 80% by weight.	§ 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) § 115.435(c) § 115.436(c) § 115.436(c)(1) ** See CAM Summary	§ 115.436(c) § 115.436(c)(1) § 115.436(c)(2) § 115.436(c)(5) § 115.436(c)(6) § 115.436(c)(7)	§ 115.436(c)(6) § 115.436(c)(7)
PRO-PR10	PRO	R5432-1	VOC	30 TAC Chapter 115, Graphic Arts Processes	§ 115.432(c)(1)(C) § 115.432(c) § 115.432(c)(1) [G]§ 115.432(d)	The owner or operator shall operate a vapor control system that achieves an overall control efficiency of at least 80% by weight.	§ 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) § 115.435(c) § 115.436(c) § 115.436(c)(1) ** See CAM Summary	§ 115.436(c) § 115.436(c)(1) § 115.436(c)(2) § 115.436(c)(5) § 115.436(c)(6) § 115.436(c)(7)	§ 115.436(c)(6) § 115.436(c)(7)
PRO-PR11	PRO	R5432-1	VOC	30 TAC Chapter 115, Graphic Arts Processes	§ 115.432(c)(1)(C) § 115.432(c) § 115.432(c)(1) [G]§ 115.432(d)	The owner or operator shall operate a vapor control system that achieves an overall control efficiency of at least 80% by weight.	§ 115.435(a)(1) § 115.435(a)(2) § 115.435(a)(3) § 115.435(a)(4) § 115.435(a)(5) § 115.435(a)(6) § 115.435(a)(7) § 115.435(a)(8) § 115.435(a)(8)(A)(i) § 115.435(c) § 115.436(c) § 115.436(c)(1)	§ 115.436(c) § 115.436(c)(1) § 115.436(c)(2) § 115.436(c)(5) § 115.436(c)(6) § 115.436(c)(7)	§ 115.436(c)(6) § 115.436(c)(7)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
							** See CAM Summary		
PRO-SAL30	PRO	R5423-1	VOC	30 TAC Chapter 115, Surface Coating Operations	§ 115.423(3)(A) § 115.423(1) § 115.426	The capture and abatement system must be capable of achieving and maintaining emission reductions equivalent to the emission limitations of § 115.421 of this title and an overall control efficiency of at least 80% of the VOC emissions from those coatings. The owner or operator shall use the following equation to determine the minimum overall control efficiency necessary to demonstrate equivalency with the emission limitations of §115.421 of this title: (see Figure: 30 TAC §115.423(3)(A))	[G]§ 115.425(2) § 115.425(4) § 115.425(4)(A)(i) [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(i) § 115.426(2)(A)(iii) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3) ** See CAM Summary	§ 115.426 [G]§ 115.426(1) § 115.426(2)(A) § 115.426(2)(A)(iv) § 115.426(2)(B) § 115.426(2)(C) § 115.426(3)	§ 115.423(3)(B) § 115.426(3)
PW01	EU	R5412	VOC	30 TAC Chapter 115, Degreasing Processes	§ 115.413(2) § 115.413(1) § 115.910	Alternative capture and control system for cold solvent cleaners with VOC emission reduction efficiency of 65% or greater may be used instead of § 115.412(1).	**See Alternative Requirement	None	None
PW02	EU	R5412	VOC	30 TAC Chapter 115, Degreasing Processes	§ 115.413(2) § 115.413(1) § 115.910	Alternative capture and control system for cold solvent cleaners with VOC emission reduction efficiency of 65% or greater may be used instead of § 115.412(1).	**See Alternative Requirement	None	None

Additional Monitoring Requirements

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CAM Summary

Unit/Group/Process Information	
ID No.: PRO-EL33	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
<p>Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.</p>	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-EL35	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
<p>Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.</p>	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-EL37/39	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-L01	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-PR08	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-PR09	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
<p>Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.</p>	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-PR10	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
<p>Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.</p>	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-PR11	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Graphic Arts Processes	SOP Index No.: R5432-1
Pollutant: VOC	Main Standard: § 115.432(c)(1)(C)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.	
CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius.	

CAM Summary

Unit/Group/Process Information	
ID No.: PRO-SAL30	
Control Device ID No.: RTO-1	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: RTO-2	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Surface Coating Operations	SOP Index No.: R5423-1
Pollutant: VOC	Main Standard: § 115.423(3)(A)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: four times per hour	
Averaging Period: three hours	
<p>Deviation Limit: For RTO-1, any time the 3-hour average falls below 1400° F while the emission unit is in operation. For RTO-2, any time the 3-hour average falls below 1600° F while the unit is in operation. Compliant temperature setpoints shall be based upon the most recent TCEQ-approved source testing efforts.</p>	
<p>CAM Text: The monitoring device should be installed in the combustion chamber or immediately downstream of the combustion chamber. Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.75% of the temperature being measured expressed in degrees Celsius; or ± 2.5 degrees Celsius. 	

Permit Shield

Permit Shield 29

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
GRPTKFARM	TANK1, TANK2, TANK3	40 CFR Part 60, Subpart K	The unit does not store petroleum liquids.
GRPTKFARM	TANK1, TANK2, TANK3	40 CFR Part 60, Subpart Ka	The unit does not store petroleum liquids.
GRPTKFARM	TANK1, TANK2, TANK3	40 CFR Part 60, Subpart Kb	The storage capacity of the unit is less than 75 cubic meters (m3).
GRPTKRTO	TANK4, TANK5	40 CFR Part 60, Subpart K	The unit does not store petroleum liquids.
GRPTKRTO	TANK4, TANK5	40 CFR Part 60, Subpart Ka	The unit does not store petroleum liquids.
GRPTKRTO	TANK4, TANK5	40 CFR Part 60, Subpart Kb	The storage capacity of the unit is less than 75 cubic meters (m3).
PRO-EL33	N/A	40 CFR Part 60, Subpart RR	The facility does not own or operate coating lines for pressure sensitive tape or labels.
PRO-EL33	N/A	40 CFR Part 60, Subpart VVV	The facility is not a coating operation associated with polymeric coating of supporting substrates.
PRO-EL33	N/A	40 CFR Part 63, Subpart JJJJ	The facility is not a major source of HAPs.
PRO-EL33	N/A	40 CFR Part 63, Subpart PPPP	The facility is not a major source of HAP emissions, and is not located at a major source, or is part of a major source of emissions of HAP.
PRO-EL35	N/A	40 CFR Part 60, Subpart RR	The facility does not own or operate coating lines for pressure sensitive tape or labels.
PRO-EL35	N/A	40 CFR Part 60, Subpart VVV	The facility is not a coating operation associated with polymeric coating of supporting substrates.
PRO-EL35	N/A	40 CFR Part 63, Subpart JJJJ	The facility is not a major source of HAPs.
PRO-EL35	N/A	40 CFR Part 63, Subpart PPPP	The facility is not a major source of HAP emissions, and is not located at a major source, or is part of a major source of emissions of HAP.
PRO-EL37/39	N/A	40 CFR Part 60, Subpart RR	The facility does not own or operate coating lines for pressure sensitive tape or labels.

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
PRO-EL37/39	N/A	40 CFR Part 60, Subpart VVV	The facility is not a coating operation associated with polymeric coating of supporting substrates.
PRO-EL37/39	N/A	40 CFR Part 63, Subpart JJJJ	The facility is not a major source of HAPs.
PRO-EL37/39	N/A	40 CFR Part 63, Subpart PPPP	The facility is not a major source of HAP emissions, and is not located at a major source, or is part of a major source of emissions of HAP.
PRO-L01	N/A	40 CFR Part 60, Subpart RR	The facility does not own or operate coating lines for pressure sensitive tape or labels.
PRO-L01	N/A	40 CFR Part 60, Subpart VVV	The facility is not a coating operation associated with polymeric coating of supporting substrates.
PRO-L01	N/A	40 CFR Part 63, Subpart JJJJ	The facility is not a major source of HAPs.
PRO-L01	N/A	40 CFR Part 63, Subpart PPPP	The facility is not a major source of HAP emissions, and is not located at a major source, or is part of a major source of emissions of HAP.
PRO-PR08	N/A	30 TAC Chapter 115, Offset Lithographic Printing	Facility does not own or operate lithographic printing. This press is a flexographic printing press.
PRO-PR08	N/A	40 CFR Part 60, Subpart FFF	Facility does not own or operate rotogravure printing. This press is a flexographic printing press.
PRO-PR08	N/A	40 CFR Part 60, Subpart QQ	Facility does not own or operate publication rotogravure press. This press is a flexographic printing press.
PRO-PR09	N/A	30 TAC Chapter 115, Offset Lithographic Printing	Facility does not own or operate lithographic printing. This press is a flexographic printing press.
PRO-PR09	N/A	40 CFR Part 60, Subpart FFF	Facility does not own or operate rotogravure printing. This press is a flexographic printing press.
PRO-PR09	N/A	40 CFR Part 60, Subpart QQ	Facility does not own or operate publication rotogravure press. This press is a flexographic printing press.

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
PRO-PR10	N/A	30 TAC Chapter 115, Offset Lithographic Printing	Facility does not own or operate lithographic printing. This press is a flexographic printing press.
PRO-PR10	N/A	40 CFR Part 60, Subpart FFF	Facility does not own or operate rotogravure printing. This press is a flexographic printing press.
PRO-PR10	N/A	40 CFR Part 60, Subpart QQ	Facility does not own or operate publication rotogravure press. This press is a flexographic printing press.
PRO-PR11	N/A	30 TAC Chapter 115, Offset Lithographic Printing	Facility does not own or operate lithographic printing. This press is a flexographic printing press.
PRO-PR11	N/A	40 CFR Part 60, Subpart FFF	Facility does not own or operate rotogravure printing. This press is a flexographic printing press.
PRO-PR11	N/A	40 CFR Part 60, Subpart QQ	Facility does not own or operate publication rotogravure press. This press is a flexographic printing press.
PRO-SAL30	N/A	40 CFR Part 60, Subpart RR	The facility does not own or operate coating lines for pressure sensitive tape or labels.
PRO-SAL30	N/A	40 CFR Part 60, Subpart VVV	The facility is not a coating operation associated with polymeric coating of supporting substrates.
PRO-SAL30	N/A	40 CFR Part 63, Subpart JJJJ	The facility is not a major source of HAPs.
PRO-SAL30	N/A	40 CFR Part 63, Subpart PPPP	The facility is not a major source of HAP emissions, and is not located at a major source, or is part of a major source of emissions of HAP.
PW01	N/A	40 CFR Part 63, Subpart T	The unit does not use chlorinated or halogenated solvents.
PW02	N/A	40 CFR Part 63, Subpart T	The unit does not use chlorinated or halogenated solvents.

New Source Review Authorization References

New Source Review Authorization References	33
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New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 9981	Issuance Date: 10/20/2017
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.418	Version No./Date: 09/04/2000

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
PRO-EL33	EXTRUDER LAMINATOR 33	9981
PRO-EL35	EXTRUDER LAMINATOR 35	9981
PRO-L01	SOLVENT ADHESIVE LAMINATOR - 01	9981
PRO-PR08	FLEXOGRAPHIC PRESS 08	9981
PRO-PR09	FLEXOGRAPHIC PRESS 09	9981
PRO-PR10	FLEXOGRAPHIC PRESS 10	9981
PRO-PR11	FLEXOGRAPHIC PRESS 11	9981
PRO-SAL30	SOLVENTLESS LAMINATOR - 30	9981
PW01	MANUAL PARTS WASHER	9981
PW02	AUTOMATIC PARTS WASHER	9981
RTO-1	REGENERATIVE THERMAL OXIDIZER 1	9981
RTO-2	REGENERATIVE THERMAL OXIDIZER 2	9981
TANK1	SOLVENT STORAGE TANK 1	9981
TANK2	GRPTKFARM	9981
TANK3	SOLVENT STORAGE TANK 3	9981
TANK4	SOLVENT STORAGE TANK 4	9981
TANK5	HAZARDOUS WASTE STORAGE TANK	9981

Alternative Requirement

Alternative Requirement..... 36

Bryan W. Shaw, Ph.D., *Chairman*
Buddy Garcia, *Commissioner*
Carlos Rubinstein, *Commissioner*
Mark R. Vickery, P.G., *Executive Director*



GPC A2

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

February 3, 2012

MR CHRIS GEORGES
CORPORATE ENVIRONMENTAL AND SAFETY SPECIALIST
PRINTPACK INC
2800 OVERLOOK PARKWAY
ATLANTA, GA 30339

Re: Alternate Control Requirements for two cold solvent cleaners (PW01 and PW02) under
Title 30 Texas Administrative Code Chapter 115, Section 115.413 (30 TAC §115.413)

Dear Mr. Georges:

This is in response to your letter dated August 5, 2011 and subsequent information requesting approval for alternate control requirements under 30 TAC §115.413(2) for two cold solvent cleaners authorized by New Source Review Permit No. 9981. We understand you wish to use an alternative capture and control system for the cold solvent cleaners in lieu of meeting the requirements of 30 TAC §115.412(1) [relating to Control Requirements]. Specifically, 100% volatile organic compound (VOC) emissions from the parts washing room, where the cold solvent cleaners reside, are being captured and routed to an oxidizer for at least 97% destruction efficiency.

Upon review of the information submitted in your request, we are able to approve your alternative capture and control system under 30 TAC §115.413(2) since your alternative capture and control system demonstrated an overall VOC emission reduction efficiency of 65% or greater.

Thank you for your interest in air pollution. If you have any questions concerning this review or need further information, please contact Ms. Louise A. Ngo, P.E. at (512) 239-1267 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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Mr. Chris Georges
Page 2
February 3, 2012

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wilson".

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MW/LAN/lan

cc: Mr. David Brymer, Director, Air Quality Division, Austin
Air Section Manager, Region 4 - Fort Worth

Project Number: 169261

Appendix A

Acronym List 39

Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring system
CVS	closed vent system
D/FW	Dallas/Fort Worth (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MACT	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr	Million British thermal units per hour
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NESHAP	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PEMS	predictive emissions monitoring system
PM	particulate matter
ppmv	parts per million by volume
PRO	process unit
PSD	prevention of significant deterioration
psia	pounds per square inch absolute
SIP	state implementation plan
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound